

1 ROBERT P. BONSALE, SBN 119261  
2 JASON RABINOWITZ, SBN 183822  
3 **BEESON, TAYER & BODINE, APC.**  
4 520 Capitol Mall, Suite 300  
5 Sacramento, CA 95814  
6 Telephone: 916.325.2100  
7 Facsimile: 916.441.5208  
8 Email: rbonsall@beesontayer.com  
9 jrabinowitz@beesontayer.com  
10 Attorneys for Plaintiffs  
11 DONALD MORTON and  
12 DANIEL SANCHEZ

8 JEFFERY OWENSBY, ESQ.  
9 **RIEGELS CAMPOS & KENYON, LLP**  
10 2500 Venture Oaks Way, Suite 220  
11 Sacramento, CA 95833-4222  
12 Telephone: 916.779.7100  
13 Facsimile: 916.779.7120  
14 Email: jowensby@rcklaw.com  
15 Attorneys for Defendant  
16 VALLEY FARM TRANSPORT, INC.

14 **UNITED STATES DISTRICT COURT**  
15 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

17 DONALD MORTON, et al.,

18  
19 Plaintiffs,

20  
21 v.

22  
23 VALLEY FARM TRANSPORT, INC.,

24  
25 Defendants.

Case No. C 06-02933 SI MED

**STIPULATION AND [PROPOSED]  
ORDER CONTINUING DEADLINE TO  
CONDUCT MEDIATION AND CASE  
MANAGEMENT CONFERENCE**

**Stipulation; Order**

Case No. C 06-02933 SI (ADR)

64704.doc

1 SUBJECT TO APPROVAL OF THIS COURT, the parties respectfully request that the Court  
2 continue the deadline to conduct the Mediation in this matter from July 30, 2007 to August 31, 2007.  
3 The parties contend there is good cause for this request as follows. On May 31, 2007 the ADR Case  
4 Administrator appointed a new Mediator in this case, James Nebel. Per the Court's Order, on June 26,  
5 2007, the parties and the Mediator had a conference call to discuss scheduling of the Mediation. The  
6 earliest possible date that worked for all parties' schedules was August 28, 2007. The parties have set  
7 the Mediation for that date. Accordingly, additional time is requested from the Court so that the parties  
8 can conduct the Mediation at that time.  
9

10 In addition to the request for additional time to conduct Mediation in this matter, the parties  
11 respectfully request a continuance of the Case Management Conference (CMC) currently set for August  
12 10, 2007 to August 31, 2007 or sometime thereafter. The parties contend there is good cause for this  
13 request as follows. The CMC was set for August 10, 2007 as the parties had intended to conduct  
14 mediation by July 30, 2007. However, as is set forth above, the earliest date the parties can conduct the  
15 Mediation is August 28, 2007. Accordingly, the parties seek continuance of the CMC to a date after the  
16 Mediation, so that the CMC can address the status of the case following mediation.  
17

18 The above requests for continuance are not brought for any improper purpose nor should any  
19 party be prejudiced by the continuances.  
20

21 Date: 07/05/07

Respectfully submitted,

BEESON, TAYER & BODINE, APC

22 By: /s/ Jason Rabinowitz

JASON RABINOWITZ

Attorneys for Plaintiffs  
23  
24  
25  
26  
27  
28

**Stipulation; Order**

Case No.C 06-02933 SI (ADR)

64704.doc

1 Date: 07/05/07

2 Respectfully submitted,  
3 RIEGELS CAMPOS & KENYON, LLP

4 By: /s/ Jeffery Owensby  
5 JEFFERY OWENSBY  
6 Attorneys for Defendant

7 **IT IS SO ORDERED.**

8 Date: \_\_\_\_\_

9 

10 SUSAN ILLSTON  
11 United States District Court Judge

12 The case management has been continued to 9/14/07  
13 @ 2:30 p.m.

14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  

---

**Stipulation; Order**

Case No.C 06-02933 SI (ADR)

64704.doc